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January 30, 2001

Administrator
Docket Management, Room PL-401
National Highway Traffic Safety Administration
400 Seventh Street, SW., Washington, DC 20590
U.S.A.

Dear sir,

We, The Japan Automobile Tire Manufacturers Association Inc., on behalf of Japanese automobile tire manufacturers, would like to submit our comments on Advance notice of proposed rulemaking [Docket No. NHTSA-00-8296] on December 1, 2000.

We would greatly appreciate it if you would kindly accept our comments.

Yours sincerely,

Motomu Shinohara
General Manager Technical Department

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Comments on Advance notice of proposed rulemaking

[Docket No. NHTSA-00-8296]

1. Tire Identification Number (TIN) on Both Sidewalls

   We object to forcing a tire manufacturer to mark TIN on both tire sidewalls.

   In case of marking TIN on both sidewalls an operator is exposed to danger such as a fatal accident due to mis-operation of curing machine, or burns, bone fracture or blow on head, arm, hand, leg the back and so on because an operator is forced to work looking up inside of a curing machine to put a stencil plate of TIN on upper mold.

2. Maximum Load Rating

   Gross weight of vehicle is a total of vehicle weight, passenger weight, loading weight, and additional accessories weight. The load on a tire varies from axle to axle due to difference of a load distribution.

   It is generally difficult for a consumer to know the actual load on his tire.

   Accordingly, even if maximum load rating is marked on a tire, it does not give any value to consumers and then maximum load rating does not need to be marked.

   However, a load index needs to be marked as a parameter to choose a suitable tire for the vehicle (referring to a tire size specified by a vehicle manufacturer).

3. Number of Plies and Cord Materials

   Number of Plies and Cord Materials might be used in the past for customers to know a tire performance level. But nowadays they are not meaningful for a consumer and are not needed.

   But in case of a rayon carcass tire, marking of material is needed because tire strength requirement for a rayon carcass tire differs from the one for a tire made of other materials.

4. UTQGS Application to deep tread, winter type snow tires and temporary use spare tires

   It is impossible to grade a deep tread, winter type snow tire and a temporary use spare tire by the same conditions as a normal tire because the usage of those tires highly differ from a normal tire.

   For example, the performance of a snow tire should be evaluated on snow road.

5. Maximum Tire Inflation Pressure

   The recommended inflation pressure most suitable for the vehicle's weight, speed performance, load distribution and so on, is indicated on the vehicle. (Even if tire size is same, the recommended tire inflation pressure varies according to the vehicle by make, model and year.)

   A consumer generally does not understand the difference between tire inflation pressure marked on a tire and another inflation pressure indicated on a vehicle. Then indication of different tire inflation pressures by a vehicle manufacturer and a tire manufacturer may lead a consumer to misunderstanding and confusion.

   Besides, inflating a tire up to maximum tire pressure in spite of light load on a tire may cause uneven wear and other failures.

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Therefore Maximum Tire Inflation Pressure should be ceased to mark on a tire.